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CITY AND COUNTY OF SAN FRANCISCO,
SHERIFF MICHAEL HENNESSEY,
GLENN YOUNG, MIGUEL PRADO AND
LARRY NAPATA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ERNEST HENDERSON, JANEL
GOTTA, AARON RAULS, MICHAEL
PEREZ, ARTURO PLEITEZ,

Plaintiffs,

vs.

CITY AND COUNTY OF SAN
FRANCISCO, SAN FRANCISCO
SHERIFF'S DEPARTMENT, SAN
FRANCISCO DEPARTMENT OF
PUBLIC HEALTH SERVICES,
SHERIFF MICHAEL HENNESSEY,
DEPUTY GLENN YOUNG, DEPUTY
MIGUEL PRADO, DEPUTY LARRY
NAPATA, AND DOES 1-11,

Defendants.

Case No. C05-0234 VRW

**ADMINISTRATIVE MOTION FOR
ENTRY OF ORDER RELATED TO
PRODUCTION OF PHOTOGRAPHS;
~~PROPOSED~~ ORDER**

**[STIPULATED]
[CIVIL L.R. 7-11]**

Date Action Filed: January 14, 2005
Trial Date: None Set

ARGUMENT

Pursuant to Rule 7-11 of the Northern District of California Civil Local Rules, defendant City and County of San Francisco seeks an Order from the Court regarding the production of photographs in this action.

At the January 26, 2006 Case Management Conference in this matter, the parties discussed with the Court the issue of the production of photographs of deputy sheriff's to counsel for plaintiff Janel Gotta to allow Ms. Gotta to identify the deputies against whom she is making her allegations. At the conference, the Court agreed with counsel for plaintiff that the each photograph should be labeled with the name of the deputy sheriff.

The parties agree that the photographs will be treated as CONFIDENTIAL PERSONNEL INFORMATION pursuant to the protective order entered in this matter on December 29, 2003, provided however that Plaintiff may show the photographs to plaintiff Janel Gotta for the purpose of Ms. Gotta identifying the deputies against whom she is making her claims.

Accordingly, CCSF submits this request for an Order related to the production of the documents. Counsel for plaintiff, Scot Candell, has approved the request and form of the proposed order.

Dated: March 30, 2006

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By: /s/
RONALD P. FLYNN

Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO,
SHERIFF MICHAEL HENNESSEY,
GLENN YOUNG, MIGUEL PRADO AND
LARRY NAPATA

~~[Proposed]~~ ORDER

Defendant City and County of San Francisco shall provide to counsel for plaintiff Janel Gotta photographs of the following San Francisco Deputy Sheriffs:

- Those who were on duty in County Jail 8 and County Jail 9 for the midnight watch on March 10, 2004 (i.e., ending 0700 on March 10, 2004);
- Those who were on duty in County Jail 8 and County Jail 9 for the day watch on March 10, 2004 (0700-1500); and
- Any other deputies who participated in the transportation of Janel Gotta from the County Jail to Sacramento on March 10, 2004.

Each photograph shall be labeled to provide the name of pictured deputy.

The photographs will be treated as CONFIDENTIAL PERSONNEL INFORMATION pursuant to the protective order entered in this matter on December 29, 2003, provided however that Plaintiff may show the photographs to plaintiff Janel Gotta for the purpose of Ms. Gotta identifying the deputies against whom she is making her claims.

IT IS SO ORDERED.

Dated: April 10, 2006

